

MIED (Rev. 06/11) Bill of Costs

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

Natalie Reeser

v.

Henry Ford Health System d/b/a Henry
Ford Hospital

Case No. 2:14-cv-11916-GCS-MJH

BILL OF COSTS

Judgment having been entered in the above entitled action on 5/19/16 against Henry Ford Health System d/b/a Henry Ford Hosp,
Date
 the Clerk is requested to tax the following as costs:

CATEGORY	ATTORNEY COMMENTS	AMOUNT
A. Fees of the Clerk		
B. Fees for service of summons and subpoena	See attached exhibits	554.84
C. Fees for printed or electronically recorded transcripts necessarily obtained for use in the case	See attached Deposition Breakdown	4247.06
D. Fees and disbursements for printing		
E. Fees for witnesses (<i>itemize on page two</i>)	See attached exhibits	278.83
F. Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case	See attached exhibits	726.50
G. Docket fees under 28 U.S.C. 1923	See attached exhibits	400.00
H. Costs as shown on Mandate of Court of Appeals		
I. Compensation of court-appointed experts		
J. Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828		
K. Other costs (<i>please itemize</i>)	See attached exhibits	4208.37
TOTAL		11,372.74

SPECIAL NOTE: Attach to your bill an itemization and documentation for requested costs in all categories.

Declaration

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill has been served on all parties in the following manner:

✓ Electronic service

First class mail/postage prepaid

Other: _____

s/ Attorney: _____

Name of Attorney: Adam C. Graham

For: Natalie Reeser

Name of Claiming Party

Date: 8/24/16

UNITED STATES DISTRICT COURT

Witness Fees (computation, cf. 28 U.S.C. 1821 for statutory fees)

NAME , CITY AND STATE OF RESIDENCE	ATTENDANCE		SUBSISTENCE		MILEAGE		Total Cost Each Witness
	Days	Total Cost	Days	Total Cost	Miles	Total Cost	
Jill Hood, 1154 Surrey Ln, South Lyon, MI 48178	1	\$12.00			80	\$46.75	\$58.75
Jill Hood, c/o Barnum LLP, 39500 High Pte Blvd, Novi, MI 48375	1	\$12.00			53.66	\$30.85	\$42.85
HFHS, Ford Pl, Detroit, MI 48202					3.4		\$1.96
HFHS, Ford Pl, Detroit, MI 48202					3.4		\$1.96
Jill Hood, c/o Terry Miglio, 160 W Fort St, 5th Fl, Detroit, MI 48226	1	\$12.00				\$12.50	\$24.50
Deserie Miller, 32836 Kathleen Dr, Chesterfield, MI 48047					34.50	\$19.84	\$19.84
Debra Reeser, 1853 Muskegon, St Helen, MI 48656					177.5	\$102.06	\$102.06
Chanda Gibson, 16242 Carlisle St, Detroit, MI 48205					12.3	\$7.07	\$7.07
Deserie Miller, 32836 Kathleen Dr, Chesterfield, MI 48047					34.5	\$19.84	\$19.84
					TOTAL		\$278.83

NOTICE

Section 1924, Title 28, U.S. Code (effective September 1, 1948) provides:

“Sec. 1924. Verification of bill of costs.”

“Before any bill of costs is taxed, the party claiming any item of cost or disbursement shall attach thereto an affidavit, made by himself or by his duly authorized attorney or agent having knowledge of the facts, that such item is correct and has been necessarily incurred in the case and that the services for which fees have been charged were actually and necessarily performed.”

See also Section 1920 of Title 28, which reads in part as follows:

“A bill of costs shall be filed in the case and, upon allowance, included in the judgment or decree.”

The Federal Rules of Civil Procedure contain the following provisions:

RULE 54(d)(1)

Costs Other than Attorneys' Fees.

Unless a federal statute, these rules, or a court order provides otherwise, costs — other than attorney's fees — should be allowed to the prevailing party. But costs against the United States, its officers, and its agencies may be imposed only to the extent allowed by law. The clerk may tax costs on 1 day's notice. On motion served within the next 5 days, the court may review the clerk's action

RULE 6

(d) Additional Time After Certain Kinds of Service.

When a party may or must act within a specified time after service and service is made under Rule 5(b)(2)(C), (D), (E), or (F), 3 days are added after the period would otherwise expire under Rule 6(a).

RULE 58(e)

Cost or Fee Awards:

Ordinarily, the entry of judgment may not be delayed, nor the time for appeal extended, in order to tax costs or award fees. But if a timely motion for attorney's fees is made under Rule 54(d)(2), the court may act before a notice of appeal has been filed and become effective to order that the motion have the same effect under Federal Rule of Appellate Procedure 4(a)(4) as a timely motion under Rule 59.

DEPOSITION BREAKDOWN

Deposition transcripts used in **Post-Judgment Motions** filed after the submission of the Bill of Costs:

1. Deposition of Natalie Reeser – used in Plaintiff's Response to Defendant's Motion for Judgment filed July 12, 2016, pg. 11 (attached)

Deposition transcripts necessarily obtained for use in the case under 28 U.S.C. §1920(2) to support motions, examination of witnesses, the scope of discovery, and argument at trial. See *MacDonald v. United Parcel Serv.*, No. 07-12022, 2010 WL 1254607 (E.D. Mich. Mar. 26, 2010) (attached)

1. Deposition of Natalie Reeser
2. Deposition of Jill Hood
3. Deposition of Martha Wiseheart
4. Deposition of Fiona Bork

Deposition transcripts used for impeachment at trial:

1. Deposition of Jill Hood – read into the record on or about May 12, 2016
2. Deposition of Fiona Bork - read into the record on or about May 11, 2016 and May 12, 2016

Deposition transcripts used in motions:

1. Deposition of Natalie Reeser – used in Plaintiff's Response to Defendant's Motion for Summary Judgment filed June 10, 2015 – pg. 1, 2, 3, 6, 7, 9, 10, 11, 14, 17, 24, 25
2. Deposition of Jill Hood - used in Plaintiff's Response to Defendant's Motion for Summary Judgment filed June 10, 2015 – pg. 4, 5, 6, 7, 8, 11, 12, 13, 17, 18, 19, 20, 22, 23, 25
3. Deposition of Martha Wiseheart filed June 10, 2015 – used in Plaintiff's Response to Defendant's Motion for Summary Judgment – pg. 1, 2, 3, 14, 20, 21
4. Deposition of Fiona Bork filed June 10, 2015 - used in Plaintiff's Response to Defendant's Motion for Summary Judgment – pg. 2, 12, 20, 21, 22

Costs for Natalie Reeser

<u>Delivery</u>	<u>Date</u>	<u>Cost</u>	<u>Description</u>
	7/22/2015	<u>\$80.00</u>	Area Delivery to Spectrum Computer Forensics
Total		\$80.00	
<u>Fees of Service of Summons and Subpoena</u>			
	5/19/2014	\$35.00	Serve Summons & Complaint/Return POS Detroit
	5/19/2014	\$60.00	Serve Summons & Complaint/Return POS (Novi)
	6/10/2014	\$275.00	Serve Summons and Complaint/Return POS Detroit
	12/29/2015	\$60.00	Process Service on Chanda Gibson
	12/15/2015	\$60.00	Process Service Henry Ford Health System
	4/28/2016	\$19.84	Process Service to Desire Miller
	12/15/2015	\$25.00	Process Service Henry Ford Health System
	4/28/2016	<u>\$20.00</u>	Process Service Henry Ford Hospital
Total		\$554.84	
<u>Computerized Research</u>			
	5/19/2014	\$58.32	Computerized Research for the Month of May
	7/9/2014	\$167.17	Computerized Research for the Month of June
	7/31/2014	\$24.76	Computerized Research for the Month of July
	10/21/2014	\$11.08	Computerized Research for the Month of August
	11/24/2014	\$9.87	Computerized Research for the Month of September
	12/22/2014	\$227.98	Computerized Research for the Month of November
	2/24/2015	\$36.81	Computerized Research for the Month of February
	3/13/2015	\$77.49	Computerized Research for the Month of March
	4/22/2015	\$370.51	Computerized Research for the Month of April
	6/30/2015	\$55.91	Computerized Research for the Month of May
	7/31/2015	\$597.97	Computerized Research for the Month of June
	8/30/2015	\$746.77	Computerized Research for the Month of July
	10/27/2015	\$174.91	Computerized Research for the Month of October
	12/23/2015	\$870.53	Computerized Research for the Month of December
	2/29/2016	\$23.43	Computerized Research for the Month of February
	3/31/2016	\$744.75	Computerized Research for the Month of March

Costs for Natalie Reeser

4/12/2016	<u>\$779.58</u>	Computerized Research for the Month of April	Name and address
Total	\$4,977.84		
<u>Filing Fees</u>			
6/18/2014	<u>\$400.00</u>	Complaint and Demand for Jury Trial	
	\$400.00		
<u>Court Reporter</u>			
3/24/2015	\$2,036.00	Transcript of the Deposition of Fiona Bork on March 16/2015	
4/8/2015	\$79.50	Natalie Reeser Deposition	
4/22/2015	\$773.75	Natalie Reeser Deposition	
5/14/2015	\$1,275.00	Transcript of the Deposition of Jill Hood	
4/27/2016	<u>\$82.80</u>	Transcript of motion hearing held on April 21,2016	
Total	\$4,247.05		
<u>Witness Fees</u>			
3/4/2015	\$42.85	Jill Hood, C/O Varnum LLP, 39500 High Pointe Blvd. Suite 350, Novi, MI 48375	
2/20/2015	\$58.75	Natalie Reeser, 9801 Merideth Grade, Harrison, MI 48625	
11/24/2015	\$19.84	Desirie Miller, 32836 Kathleen Drive, Chesterfield Township, MI 48047	
11/19/2015	\$7.07	Chanda Gibson, 16242 Carlisle Street, Detroit, MI 48205	
4/12/2016	\$102.06	Debra Reeser, 1853 Muskegon, St. Helen, MI 48656	
4/12/2016	\$19.84	Desirie Miller, 32836 Kathleen Drive, Chesterfield Township, MI 48047	
4/14/2016	\$3.92	Henry Ford Health System, Detroit, MI	
4/12/2016	<u>\$24.50</u>	Jill Hood, C/O Terry Miglio 160 W. Fort Street,5th Floor, Detroit, MI 48226	
Total	\$278.83		
<u>Document Production/Copies</u>			
1/8/2015	\$30.50	Document Production from Varnum LLP	
3/1/2015	\$189.75	Human Resource Records from Various Employers, Michigan Legal Copy LLC	
6/23/2015	\$318.00	Human Resource Records from Various Employers, Michigan Legal Copy LLC	
2/26/2016	\$92.00	Quest Diagnostics, Michigan Legal Copy LLC	
4/22/2015	\$33.00	Personnel Records from Ledin Home Health Care	
4/29/2015	<u>\$63.25</u>	Cell phone records	
	\$726.50		

Costs for Natalie Reeser

Total			
<u>Travel Expenses</u>			
Total	11/16/2015	<u>\$98.52</u> Hotel Accomodations in Flint, Michigan	
		\$98.52	
UPS	2/16/2015	\$38.54 UPS overnight	
	2/24/2016	<u>\$13.47</u> UPS overnight	
Total		\$52.01	
Grand Total			\$11,415.59